



July 3, 2019

Via Certified Mail, First Class Mail, and Email

Dr. Amy Jablonski
[REDACTED]

Raleigh, NC 27601
[REDACTED]

Charlotte, NC 28213

Re: Cease and Desist Demand & Preservation Notice

Dear Dr. Jablonski:

This letter is to advise that Shanahan Law Group, PLLC (“SLG”) represents Imagination Station, Inc. (“Istation”). As you are keenly aware, Istation was recently awarded the contract arising from the North Carolina Department of Public Instruction’s (“NCDPI”) Read to Achieve RFP (“Contract”). Please direct all communication regarding this matter to SLG; if you are represented by legal counsel, please direct this correspondence accordingly.

We have become aware that you have been making false, misleading, and defamatory public statements about Istation, its agents, its products, and the process by which Istation was awarded the Contract by NCDPI. Specifically, but not all inclusively, you have made demonstrably false statements with respect to Istation, its products, and its qualifications. Your employment ceased with the NCDPI at the end of December 2018 therefore you were not at the NCDPI for the duration of the RFP process by which our client was awarded this Contract, and you were not involved in all parts of the process by which this Contract was awarded. Nevertheless, in an effort to fuel your personal, political aspirations, you have presented yourself as an authoritative source (i.e. an “owner”) on these matters in public media and other forums. Such conduct amounts to tortious interference with the Contract that Istation was legally and appropriately awarded by NCDPI, and likely violates confidentiality provisions pertaining to both the bidding process and your employment. Accordingly, we hereby DEMAND that you cease making false and misleading representations about Istation, its products, or the process by which this Contract came into existence, whether in public or private.

Preservation Notice

As my client considers its legal options with respect to your conduct, please be advised that we believe that you may be in possession of documents, tangible items, and electronically stored information that will become an important and irreplaceable source of discovery and evidence in

this matter. By this letter, you are hereby given notice not to destroy, conceal, or otherwise alter any papers, audio or video recordings, digital or electronic files, or data generated or stored on a computer or other storage media (e.g. hard disks or drives, floppy disks, CDs, DVDs, backup tapes, flash drives, PDAs, smart phones, tablet devices, laptops or netbooks, PCs, servers, or backup media) from January 1, 2017 to the present that in any way relate to Istation, its products, or the process by which this Contract came into existence. This includes any documents, tangible items, and electronically stored information (including all emails which you generated or received) that relate to your interest in or plans for running for North Carolina Superintendent of Public Instruction. Please note that this notice includes e-mails, chat logs, instant messages, text messages, voice mails, and social media posts or messages. Failure to comply with this notice may result in severe sanctions being imposed by a court for spoliation of actual or potential evidence.

Accordingly, you must make every reasonable effort to preserve documents and information related in any way to the categories of items listed above. These efforts include, but are not limited to, an obligation to discontinue all relevant data destruction, backup tape recycling, and auto-deletion or auto-preservation policies. This obligation also includes, but is not limited to, preservation of documents, tangible items, and electronically stored information on business and personal computers or storage media.

If you have any questions regarding this correspondence, please do not hesitate to contact me, or have your attorney contact me. Nothing in this correspondence is intended to prejudice any and all rights and remedies available to Istation under applicable law. All such rights and remedies are specifically reserved.

Sincerely,

SHANAHAN LAW GROUP, PLLC



Kieran J. Shanahan